

**Remarks**

Claims 36 to 51 remain pending.

Attorney Ruggiero wishes to thank Examiner Venkat for the courtesies extended to Attorneys Zeller and Dean and Inventor Menon during the telephone interview on October 12, 2005.

Claims 36 to 51 have been rejected under 35 U.S.C. 112, first paragraph, for lack of enablement. The Action stated that there was no etiology for the treatment of cellulite. In support of this statement, the Action quoted from an abstract for the article Avram, Cellulite: a review of its physiology and treatment, J. Cosmetic & Laser Therapy, v. 6, Issue 4, p. 181-5 (Dec. 2004): "There are no truly effective treatment for cellulite". The Action also quoted from an abstract for the article Van Vliet, An assessment of traditional and novel therapies for cellulite, J. Cosmetic & Laser Therapy, 2005, 7/1 (7-10) for the proposition that "... there is no consensus as to the etiology of cellulite".

The rejection of claims 36 to 51 under 35 U.S.C. 112, first paragraph, for lack of enablement is overcome in view of the remarks below and the attached Declaration under 37 C.F.R. 1.132 by Dr. Peter M. Elias.

First, applicant does not agree with the Examiner's conclusions regarding the Avram and Van Vliet abstracts. Thus, Avram identifies four hypotheses that for the physiology of cellulite and further identifies four categories of treatment modalities. The last sentence is a qualitative one, inasmuch as the phrase "effective treatment" is modified by the adverb "truly". Van Vliet states that "There are numerous treatments

for cellulite including topical, surgical, laser and other therapies". As to the causation of cellulite, Van Vliet merely indicates that there is no consensus regarding the etiology of cellulite.

Second, Dr. Elias, in his Declaration, states that disclosure of the present application clearly articulates the invention as set forth in the claims 36 to 51 and places him, a person skilled in the art, in possession of it. Dr. Elias states that Examples 1 and 2 of the present application clearly demonstrate the stabilizing effect of perilla oil on PPAR upregulation. Dr. Elias states that page 1, lines 12 and 13 of the 09/521,442 application directly associates the treatment or amelioration of cellulite with the upregulation of PPAR, and that this association is logical and reasonable.

The Continuation of Substance of Interview of the Interview Summary of October 12, 2005 stated there was no nexus between cellulite and the prevention of upregulation of PPAR. The Continuation of Substance of Interview further stated that competent documentation establishing this nexus would be given careful consideration.

There is indeed a nexus between the formation of cellulite and the upregulation of PPARgamma receptors. Dr. Elias, in his Declaration, provides a description of the physiology of cellulite at page 1 bridging to page 2, and states that blocking PPARgamma receptors would be a logical means for treating or ameliorating cellulite since PPARgamma receptors regulate adipocyte growth and differentiation. Dr. Elias states that blocking could be achieved by two different mechanisms: 1) down-regulation of PPARgamma receptor levels, and 2) competitive inhibition with endogenous PPARgamma activators, thereby reducing

(i.e., stabilizing) the numbers of PPARgamma receptors that are available to be activated. The foregoing statements by Dr. Elias are deemed a sufficient showing of a nexus between the formation of cellulite and the upregulation of PPARgamma receptors.

Third, the rejection of claims 36 to 51 under 35 U.S.C. 112, first paragraph, for lack of enablement in view of the quoted statements in the abstracts is not well taken. The Action quoted two abstracts that conjectured that there are no effective treatments for cellulite or that there is no consensus as to the etiology of cellulite. A search of the USPTO issued patent database (1976 to date) revealed 32 patents having the term "cellulite" in their titles (search report attached). A review of the listed titles reveals methods and/or compositions for treating, reducing, or removing cellulite. Apparently, the etiology, physiology of formation, and anatomical structure of cellulite are understood well enough that numerous methods and/or compositions for treating, reducing, or removing cellulite have been proposed and patented.

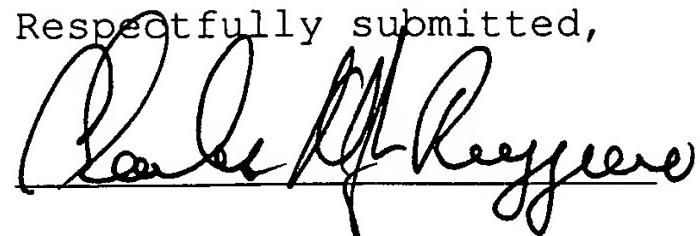
Finally, claims 36 to 51 are novel and nonobvious in view of the prior art. To this end, no particular prior art has been cited against the claims. Dr. Elias, in his Declaration, further adds that he is not aware that PPARgamma stabilizers, including perilla oil, have been employed to treat cellulite in the skin biology or dermatology art outside of the disclosure in the present application. Dr. Elias also adds that the use of PPARgamma stabilizers, including perilla oil, in the treatment or amelioration of cellulite is new and not obvious to him.

Dr. Elias is a paid consultant for Avon Products Inc.

Reconsideration of claims 36 to 51 is deemed warranted in view of the foregoing, and allowance of said claims is earnestly solicited.

Dated: May 19, 2006

Respectfully submitted,



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**TTL/cellulite: 32 patents.**

## Hits 1 through 32 out of 32

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[www.ttlcellulite.com](http://www.ttlcellulite.com)

PAT. NO.	Title
1	<u>6,988,979 T Cellulite reducing bench</u>
2	<u>6,953,583 T Use of conjugated linoleic acid (CLA) for the topical treatment of cellulite</u>
3	<u>6,916,328 T Percutaneous cellulite removal system</u>
4	<u>6,743,215 T Method and apparatus for skin absorption enhancement and cellulite reduction</u>
5	<u>6,687,537 T Method and apparatus for skin absorption enhancement and cellulite reduction</u>
6	<u>6,676,977 T Pharmaceutical compositions and methods for reducing the appearance of cellulite</u>
7	<u>D482,127 T Cellulite reduction tool</u>
8	<u>6,596,289 T Anti-cellulite pantyhose</u>
9	<u>6,539,946 T Alternating pressure method for cellulite reduction</u>
10	<u>6,511,445 T Cellulite massage system with gel dispenser</u>
11	<u>6,443,914 T Apparatus and method for preventing and treating cellulite</u>
12	<u>6,394,946 T Treatment of cellulite</u>
13	<u>D456,522 T Cellulite reducing device</u>
14	<u>6,358,539 T Pharmaceutical compositions for reducing the appearance of cellulite</u>
15	<u>D438,977 T Cellulite handle</u>
16	<u>6,153,207 T Anti-cellulite pantyhose</u>
17	<u>6,071,526 T Cosmetic or cosmetic product for firming and soothing the skin in particular in the case of cellulite</u>
18	<u>D423,677 T Cellulite massager</u>
19	<u>D423,109 T Cellulite reducing device</u>
20	<u>5,962,482 T Method of reducing cellulite in mammalian skin</u>
21	<u>5,945,109 T Cosmetic or cosmetic product for firming and smoothing the skin, in particular in the case of cellulite</u>

- 22 D400,261 **T** Anti cellulite device

23 5,778,894 **T** Method for reducing human body cellulite by treatment with pulsed electromagnetic energy

24 5,776,074 **T** Dynamic system of survey and selection of treatments of cellulite

25 5,705,170 **T** Herbal cellulite treatments

26 5,667,793 **T** Skin care compositions for treating cellulite

27 5,587,396 **T** Method of ameliorating cellulite by disrupting the barrier function of the stratum corneum

28 5,536,499 **T** Cosmetic compositions for reducing or preventing signs of cellulite

29 5,051,449 **T** Treatment of cellulite with retinoids

30 5,030,451 **T** Topical slenderizing formulation containing caffeine carboxylic acid derivatives neutralized by organic bases, preparation thereof, and their use in the treatment of cellulite

31 4,829,987 **T** Mineral body wrap combined with exercise for treating cellulite

32 4,086,922 **T** Method and apparatus for treating cellulite containing areas of the human body

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**Pat Num**

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**PETER M. ELIAS, M.D.**

**CURRICULUM VITAE**

DATE OF BIRTH: April 1, 1941

PLACE OF BIRTH: Waltham, Massachusetts

EDUCATION:

Stanford University, Stanford, California - B.A.	1963
University of California, San Francisco - M.D.	1967
University of California, San Francisco - M.S.	1975

POSTDOCTORAL TRAINING:

Rotating Internship, King County - Harborview Hospital, Seattle, Washington	1967-1968
Resident in Internal Medicine, University of California, San Francisco, California	1968-1969
Clinical Associate, Dermatology Branch, National Cancer Institute, Bethesda, Maryland	1969-1970
Dermatology Resident, Clinical and Research Fellow, Harvard Medical School, Boston, Massachusetts	1971-1973
Dermatology Foundation, and NIH Fellow, Department of Pathology, University of California, San Francisco, California	1973-1975

BOARD CERTIFICATION:

Dermatology	1973
Dermatopathology	1979

PROFESSIONAL APPOINTMENTS: 1974-1979

Assistant Professor, Department of Dermatology, University of California, San Francisco, California	
Associate Professor of Dermatology	1979-1985
Chief, Dermatology Service, Veterans Administration Hospital, San Francisco,	1975-1997
Professor and Vice-Chairman, Department of Dermatology University of California, San Francisco, California	1985-present
Chairman, Field Advisory Group, Veterans Administration Central Office	1980-1983
Council on Governmental Liaison, American Academy of Dermatology	1980-1983
Medical and Scientific Committee, Dermatology Foundation	1983-1987

HONORS AND AWARDS:

Experimental Dermatology, Co-author, Gold Medal Award for Scientific Exhibits, AAD meeting	1971
N.A.T.O. Senior Fellowship in Science	1973
Author, Gold Medal Award for Scientific Exhibits, AAD meeting	1978
American Society for Clinical Investigation	1982-present
American Association of Professors	1992-present
Author, Bronze Medal Award for Scientific Exhibits, AAD meeting	1984
Experimental Dermatology, Editorial Board	1991-present
Skin Pharmacology and Applied Physiology, Editorial Board	1987-present
Robert Chesebrough Gold Medal for Research	1990
Fellow, California Academy of Sciences	1991-present
Literature Award, Society of Cosmetic Chemists	December 1992
The Journal of Investigative Dermatology, Associate Editor	1997-present
Recipient of the Paul Gerson Unna Prize	May 1999
William Montagna Award, Society for Investigative Dermatology	May 2001
Irwn H. Blank Memorial Lecturer, Wellman Laboratories, Harvard Medical School	April 2002
Maison G. deNavarre Medal Award, Society of Cosmetic Chemists	December 2002
George P. Odland Lecturer, Department of Dermatology, University of WA	May, 2003

SOCIETY MEMBERSHIPS AND PUBLIC SERVICE:

Founding Member of Society of Skin Pharmacology and Physiology  
American Society for Cell Biology  
Society of Investigative Dermatology  
National Ichthyosis Foundation, Medical Advisory Board  
American Federation for Clinical Research  
American Society for Clinical Investigation  
American Association of Professors  
Society for Cutaneous Ultrastructure Research  
Alopecia Areata Foundation, Medical Advisory Board  
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American Academy of Dermatology, Committee on Occupational Dermatology  
Dermatology Foundation, Leaders Society  
Skin Pharmacology Society, Board Member

EDITORIAL BOARD MEMBERSHIPS

Journal of Investigative Dermatology  
Archives of Dermatology  
Dermatology  
Critical Reviews of Drug Carrier Systems  
Experimental Dermatology  
Skin Pharmacology and Applied Physiology

Articles:

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